

**DECLARATION OF ADI ALLUSHI, ESQ.**

Adi Allushi, pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury declares as follows:

1. My name is Adi Allushi. I am more than twenty-one years of age, competent to testify, and have no legal or mental disability and have personal knowledge of the facts stated herein. This declaration was executed in the state of Texas, where I am a resident.
2. I was counsel of record for Defendants in this case and several other Georgia cases, from 2019–2023. In all, there were more than 20 plaintiffs with the same counsel in those cases.
3. In February 2023, plaintiffs in several cases, including the H.B. and G.W. cases,<sup>1</sup> entered into a sharing agreement to streamline and economize discovery and to avoid multiple depositions of plaintiffs and Red Roof employees. The email discussing that agreement is attached as Exhibit 1.
4. Among other things, the plaintiffs agreed to limit their depositions of operations employees like Jay Moyer to one hour. The parties agreed that the testimony of operations employees like Jay Moyer about other Red Roof locations at other times would be used in the H.B. and G.W. cases. The parties reached this

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<sup>1</sup> *H.B. v. Red Roof Inns, et al.*, Case No. 1:22-cv-01181-JPB; *G.W. v. Red Roof Inns, Inc. et al.*, Case No. 1:23-cv-04542-SEG.

agreement because the one-hour deposition limit meant that the plaintiffs had to reference the witness's prior deposition testimony about incidents and practices at other times and places. Allowing plaintiffs such as H.B. and G.W. to use a witness's prior deposition testimony about other Red Roof locations and the incidents and practices there at other times was a primary purpose of the sharing agreement.

5. For example, in the H.B. case, Mr. Moyer testified in his deposition that he did not allow sex trafficking or prostitution at any of the hotels he oversaw. The purpose of the sharing agreement was to avoid re-questioning Mr. Moyer about incidents alleging those kinds of facts in the H.B. case because that had already been covered in the prior depositions.
6. Another example is in the oversight, responsibilities, and policies Mr. Moyer followed in managing the hotel's operations. At the H.B. deposition, Mr. Moyer was asked,

Q. Were your duties and responsibilities at the Norcross Red Roof the same as the duties and responsibilities that you testified about in your earlier deposition regarding the Buckhead Red Roof and the Smyrna Red Roof when it was corporately owned?

A. Yes.

Q. When you did visit the Norcross Red Roof Inn, um, did you do the same kind of oversight activities there as you did at the other hotels, such as Buckhead and Smyrna, as you testified in your earlier deposition?

A. Yes, very consistent.

Q. [I]n your earlier deposition at Buckhead and Smyrna you talked some about, um, I don't believe specifically, but the type of things that you would do in response to reports of crime or illegal activity at hotels. And my question is: Would your response at the Norcross Red Roof Inn have been the same as your response at every other hotel in your region?


A. I would think they would be similar. I don't know they'd be the same exact.

The sharing agreement contemplated allowing H.B. and G.W. to use testimony from prior depositions, like that referenced above.

7. While Defendants did not waive other admissibility and evidentiary objections to the prior deposition testimony of operations employees like Jay Moyer, the parties contemplated and agreed to admit evidence of other times and places to streamline the H.B. and G.W. cases.

8. I have read this Declaration consisting of 8 numbered paragraphs and I  
declare under penalty of perjury that it is true and correct.

Executed on October 28, 2024.

Signed by:  
  
493B9B07FC364A3...

Adi Allushi, Esq.

# Exhibit 1

## Alexis O. Rivera

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**From:** Pat McDonough  
**Sent:** Tuesday, February 28, 2023 9:11 AM  
**To:** Allushi, Adi  
**Cc:** Alexis O. Rivera; Briscoe, Tameika; Mobley, Cameron; Nation, Deborah; Jonathan S. Tonge  
**Subject:** Re: H.B. v. RRI, et al.  
**Attachments:** image001.png; image002.png; image003.png; image004.png; image005.png; image006.png; image007.png; Logo\_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png

Hi Adi, the agreement is confirmed with your redline additions.

Thanks, Pat

Sent from my iPhone



*Please join us at Andersen, Tate & Carr for our annual  
Relay for Life Cookout Thursday, May 18th, 2023 12:00 -  
3:00 p.m.*

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**Patrick J. McDonough, ESQ.**  
Partner

Tel: 770-822-0900  
Dir: 678-518-6859  
Fax: 770-236-9795  
Email: [pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)  
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On Feb 27, 2023, at 6:49 PM, Allushi, Adi <[adi.allushi@lewisbrisbois.com](mailto:adi.allushi@lewisbrisbois.com)> wrote:

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Pat – confirmed, subject to the below qualifiers in red. Thanks.

<Logo\_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png>

**Adi Allushi**  
**Partner**  
**[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)**

T: 404.991.2173 F: 404.467.8845

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This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

**From:** Pat McDonough <[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)>**Sent:** Monday, February 27, 2023 1:04 PM**To:** Allushi, Adi <[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)>**Cc:** Alexis O. Digiorgio <[adigiorgio@atclawfirm.com](mailto:adigiorgio@atclawfirm.com)>; Briscoe, Tameika <[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)>; Mobley, Cameron <[Cameron.Mobley@lewisbrisbois.com](mailto:Cameron.Mobley@lewisbrisbois.com)>; Nation, Deborah <[Deborah.Nation@lewisbrisbois.com](mailto:Deborah.Nation@lewisbrisbois.com)>; Jonathan S. Tonge <[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)>**Subject:** [EXT] RE: H.B. v. RRI, et al.

Adi,

To further clarify, this is the agreement as I understand it. Please confirm.

This agreement applies to HB and the following unfiled cases: GW, AJ, TW, MP, KH, and CH. We cannot make agreements about potential clients we may or may not represent in the future as that would violate the rules of professional conduct.

RRI West and the current parties consent to the motion to add RRI West in HB. RRI West and the current parties agree not to seek apportionment to any other Red Roof or Westmont-related entities.

The parties agree to share for use in these cases all depositions taken in WK, CP, WR, JA and the Jane Doe 1-4 cases. The parties also agree to share for use in these cases all ESI and document productions previously made by either party. **The parties agree said use is subject to admissibility and evidentiary rules.**

We agree that all employees and executives that have already been deposed in the above cases will not be deposed again in the HB case, or the six cases listed above except for a short (less than one hour) deposition of operations employees related to a property not included in the previous depositions. Likewise, Defendants will not re-depose any clients or former clients who were already deposed in the other cases, **except for a short deposition, if required, related to the HB, GW, AJ, TW, MP, KH, and CH action.**

Please confirm this agreement today. We will file the motion, with or without consent, tomorrow.

Thanks.

*Please join us at Andersen, Tate & Carr for our annual  
Relay for Life Cookout Thursday, May 18th, 2023 12:00 -  
3:00 p.m.*

[DONATE Here](#)[RSVP Here](#)

**Patrick J. McDonough, ESQ.**  
Partner

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**From:** Allushi, Adi <[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)>  
**Sent:** Friday, February 24, 2023 5:53 PM  
**To:** Pat McDonough <[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)>  
**Cc:** Alexis O. Digiorgio <[adigiorgio@atclawfirm.com](mailto:adigiorgio@atclawfirm.com)>; Briscoe, Tameika <[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)>; Mobley, Cameron <[Cameron.Mobley@lewisbrisbois.com](mailto:Cameron.Mobley@lewisbrisbois.com)>; Nation, Deborah <[Deborah.Nation@lewisbrisbois.com](mailto:Deborah.Nation@lewisbrisbois.com)>; Jonathan S. Tonge <[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)>  
**Subject:** RE: H.B. v. RRI, et al.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Pat – as discussed, please respond that you consent to be bound by the agreement that all Red Roof (all legal entities) employees and executives that have already been deposed will not be deposed again in the HB case, or any of your unfiled cases (whether retained clients or not), except for a short (less than one hour) deposition of operations employees related to a property not included in the previous depositions. In exchange, RRI West will consent to the motion to add it as a party in HB. Thanks

Adi

**Adi Allushi**  
**Partner**  
[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)

<image007.png>

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**From:** Pat McDonough <[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)>  
**Sent:** Friday, February 10, 2023 12:54 PM  
**To:** Allushi, Adi <[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)>  
**Cc:** Alexis O. Digiorgio <[adigiorgio@atclawfirm.com](mailto:adigiorgio@atclawfirm.com)>; Briscoe, Tameika <[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)>; Mobley, Cameron <[Cameron.Mobley@lewisbrisbois.com](mailto:Cameron.Mobley@lewisbrisbois.com)>; Nation, Deborah <[Deborah.Nation@lewisbrisbois.com](mailto:Deborah.Nation@lewisbrisbois.com)>; Jonathan S. Tonge <[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)>  
**Subject:** [EXT] Re: H.B. v. RRI, et al.

Adi,

Hope you are well.

Jon has sent a few emails and I sent you a text. As we did in the CP and WR, will you consent for us to add RRI West Management as a Defendant in HB case?

Thanks in advance, Pat

Sent from my iPhone



**Patrick J. McDonough, ESQ.**  
Partner

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On Feb 9, 2023, at 10:16 AM, Jonathan S. Tonge <[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)> wrote:

Adi, any word on this request?

**Jonathan S. Tonge**  
Attorney at Law

Tel: 770-822-0900  
Fax: 770-236-9784  
Email: jtonge@atclawfirm.com

**From:** Jonathan S. Tonge

**Sent:** Friday, February 3, 2023 9:51 AM

**To:** Alexis O. Digorgio <[adigiorgio@atclawfirm.com](mailto:adigiorgio@atclawfirm.com)>; Briscoe, Tameika <[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)>; Mobley, Cameron <[Cameron.Mobley@lewisbrisbois.com](mailto:Cameron.Mobley@lewisbrisbois.com)>; Nation, Deborah <[Deborah.Nation@lewisbrisbois.com](mailto:Deborah.Nation@lewisbrisbois.com)>; Pat McDonough <[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)>

**Subject:** H.B. v. RRI, et al.

Adi, as in C.P. and W.R., will y'all consent to the addition of RRI West Management as a defendant? If so, I'll draft a consent motion and send it around. Let me know and I'll get that over to you.

Thanks,  
Jon

**Jonathan S. Tonge**  
Attorney at Law

Tel: 770-822-0900  
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